## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

| RUBY LEVI and EMILY CHICOINE on behalf           | ) |                              |
|--|---|------------------------------|
| of themselves and all others similarly situated, | ) |                              |
|  | ) |                              |
| Plaintiffs,                                      | ) |                              |
|  | ) |                              |
| V.   | ) |                              |
|  | ) | Civ. A. No. 1:15-cv-216S-PAS |
| GULLIVER'S TAVERN, INCORPORATED,                 | ) |                              |
| SOLID GOLD PROPERTIES, INC., all d/b/a           | ) |                              |
| THE FOXY LADY,                                   | ) |                              |
|  | ) |                              |
| Defendants.                                      | ) |                              |

# STATUS REPORT AND JOINT MOTION TO EXTEND STAY

Pursuant to the Court's Order dated February 16, 2021, Plaintiffs Ruby Levi and Emily Chicoine, on behalf of themselves and all others similarly situated, and Defendants Gulliver's Tavern, Incorporated, and Solid Gold Properties, Inc., submit this status report and joint motion to extend the administrative stay currently in effect.

- 1. As previously reported, *see* docket no. 65, the parties in this matter have reached an agreement that will allow them to consummate a potential class settlement they had previously reached, but which they had not been able to submit for Court approval due to the impact of COVID-19 on Defendants' business operations.
- 2. Since their prior status report, the parties have worked diligently and cooperatively to prepare the written version of their proposed class settlement. However, as of the date of this report, they have not yet been able to fully finalize the terms of that agreement. The parties anticipate being able to submit an agreement in that regard for the Court's approval on or before May 14, 2021.

3. In order to afford the parties sufficient time to prepare and execute their settlement agreement, and to prepare the necessary papers for submitting that agreement to the Court for its review and approval, the parties respectfully request that the Court extend the administrative stay in this matter to May 14, 2021.

Respectfully submitted, RUBY LEVI and EMILY CHICOINE, on behalf of themselves and all others similarly situated,

By their attorneys,

Respectfully submitted, GULLIVER'S TAVERN, INCORPORATED, and SOLID GOLD PROPERTIES, INC.,

By their attorneys,

#### /s/ Stephen J. Brouillard\_

Stephen J. Brouillard, Esq. (BBO #6284)
BIANCHI & BROUILLARD, P.C.
The Hanley Building
56 Pine Street, Suite 250
Providence, RI 02903
Tel. (401) 223 - 2990
Fax. (877) 548 - 4539
sbrouillard@bbrilaw.com

Brant Casavant (Mass. BBO #666029)
Admitted pro hac vice
Stephen Churchill (Mass. BBO #564158)
Admitted pro hac vice
FAIR WORK, P.C.
192 South Street, Suite 450
Boston, MA 02111
Tel. (617) 607 - 3260
Fax. (617) 488 - 2261
brant@fairworklaw.com

steve@fairworklaw.com

### /s/ Michael E. Jusczyk\_

Barry J. Miller (admitted pro hac vice)
bmiller@seyfarth.com
Michael E. Jusczyk, Bar No. 7791
mjusczyk@seyfarth.com
SEYFARTH SHAW LLP
Seaport East, Suite 300
Two Seaport Lane
Boston, Massachusetts 02210
Telephone: (617) 946-4800

Facsimile: (617) 946-4801

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 29<sup>th</sup> day of March, 2021, this document was filed electronically and is available for viewing and downloading from the ECF system and that service is being accomplished electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) with service upon the newly added defendants being accomplished pursuant to Fed. R. Civ. P. 4.

/s/ Stephen J. Brouillard
Stephen J. Brouillard